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November 17, 2023

VIA ECF

Hon. Judge Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street, Room 1620 New York, New York 10007

Re: Aaron Abadi v. American Airlines Group Inc., et al 1:23 Civ. 4033 (LJL)

Request for Extension of Time

Dear Hon. Judge Liman:

We represent defendant, Center for Emergency Medicine of Western Pennsylvania, Inc. d/b/a STAT-MD ("STATMD") in the above-referenced action.

This letter request for extension of time is being submitted on behalf of Defendant STATMD with the consent of Plaintiff *pro se* Aaron Abadi.

The current deadline for responding to Plaintiff's Complaint is December 5, 2023. We respectfully request that the time for STATMD to respond to Plaintiff's Complaint be extended up to and including December 20, 2023. Plaintiff *pro se* Aaron Abadi has consented to this request for extension of time.

This would be STATMD's first request for an extension of time to respond to the Complaint. There is no currently scheduled conference in this matter. STATMD continues to reserve all of its rights and defenses, none of which are waived by this request.

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Please contact the undersigned should you have any questions regarding the above request.

Respectfully submitted,

Beverly M. Barr, 2sq. (BB2665) Dickie McCamey & Chilcote Attorneys for Defendant

Center for Emergency Medicine of

Western Pennsylvania, Inc. dba STATMD

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cc: Aaron Abadi, Plaintiff Pro Se (via email)

All Counsel of Record via ECF